

SUMMARY OF FEES AND COSTS RELATED TO MEDIATION AND SANCTIONS

<u>Date</u>	<u>Name</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
10/14/19	Michael A. Shafer	420.00	1.60	672.00	Draft mediation letter
10/15/19	Michael A. Shafer	420.00	1.20	504.00	Draft mediation statement
10/16/19	Brad R. Newberg	855.00	1.20	1,026.00	Drafting of mediation statement
10/16/19	Michael A. Shafer	420.00	0.20	84.00	Draft mediation statement
10/17/19	Brad R. Newberg	855.00	0.70	598.50	Finalize first draft of mediation statement
10/21/19	Brad R. Newberg	855.00	0.50	427.50	Discussion of mediation and strategy with client
10/24/19	Brad R. Newberg	855.00	1.00	855.00	Call with mediator and finalize statement
10/25/19	Brad R. Newberg	855.00	0.60	513.00	Finalize mediation statement after research
10/30/19	Brad R. Newberg	855.00	3.10	2,650.50	Prepare for mediation, and discussions with client and mediator after mediator proposal
10/31/19	Brad R. Newberg	855.00	11.50	9,832.50	Travel to (6.5), prepare for and attend mediation that Defendant did not show for; meet with client to prepare for and discussion mediation; call M. Shafer about motion for sanctions
10/31/19	Michael A. Shafer	420.00	1.00	420.00	Prepare sanctions motion
11/01/19	Brad R. Newberg	855.00	3.60	3,078.00	Gathering of materials for sanctions motion, communications to adversary, and communications on and drafting of motion
11/01/19	Michael A. Shafer	420.00	6.00	2,520.00	Draft motion for sanctions
11/04/19	Brad R. Newberg	855.00	5.20	4,446.00	Call with opposing counsel on motion and drafting of motion
11/04/19	Michael A. Shafer	420.00	1.80	756.00	Draft motion for sanctions

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11/05/19	Brad R. Newberg	855.00	6.10	5,215.50	Drafting of sanctions motion including review of legal sections, edits to fact sections and declaration, and review of supporting papers
11/05/19	Michael A. Shafer	420.00	4.00	1,680.00	Draft motion for sanctions, notice of sanctions, and proposed order
11/06/19	Brad R. Newberg	855.00	3.00	2,565.00	Finalizing draft of sanctions motion
11/06/19	Michael A. Shafer	420.00	3.50	1,470.00	Finalize motion for sanctions
11/18/19	Brad R. Newberg	855.00	1.30	1,111.50	Review response in sanctions motion
11/19/19	Brad R. Newberg	855.00	6.20	5,301.00	Work on reply in sanctions motion, research and drafting
11/20/19	Brad R. Newberg	855.00	5.50	4,702.50	Finish first draft of sanctions reply with certain research still needed
11/21/19	Brad R. Newberg	855.00	3.50	2,992.50	Declarations for sanctions reply and research last cases and other cases involving R. Liebowitz
11/21/19	Michael A. Shafer	420.00	2.00	840.00	Review reply in motion for sanctions; review M. McKenna's declaration
11/22/19	Brad R. Newberg	855.00	3.00	2,565.00	Review of sanctions reply and declarations before final look
11/25/19	Brad R. Newberg	855.00	1.00	855.00	Final work on Sanctions Motion reply
01/02/20	Brad R. Newberg	855.00	4.70	4,018.50	Draft questions and argument for hearing
01/06/20	Brad R. Newberg	855.00	6.00	5,130.00	Prepare questions and argument for hearing
01/07/20	Brad R. Newberg	855.00	7.50	6,412.50	Prepare questions, exhibits and argument for hearing (4.0) and travel to hearing (3.5)
01/08/20	Brad R. Newberg	855.00	8.20	7,011.00	Prepare for hearing (1.1), participate at hearing (3.6), and travel from hearing (3.5)
01/15/20	Brad R. Newberg	855.00	2.40	2,052.00	Review January 13 letter, research law, and draft response
01/16/20	Brad R. Newberg	855.00	2.00	1,710.00	Review of cost and fee information and draft of letter to court regarding sanctions

<u>Date</u>	<u>Name</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
01/16/20	Michael A. Shafer	420.00	1.00	420.00	Gathering and formatting cost and fee information for mediation and sanctions
	Subtotal Fees:			84,435.00	

Costs:

Brad R. Newberg	428.75	Trip to New York for mediation
Brad R. Newberg	995.24	Overnight Trip to New York
Subtotal Costs:	1423.99	

TOTAL: **85,858.99**